

Huntington Power Plant

6 miles west of Huntington, Utah on Hwy. 31 P.O. Box 680 Huntington, Utah 84528

August 9, 2016

Mr. Bryce Bird, Director Utah Department of Environmental Quality Division of Air Quality 195 North 1950 West P.O. Box 144820 Salt Lake City, UT 84114-4820

RE: Updated Notification of Compliance Status 40 CFR 63 SubPart UUUUU – Unit 2, Huntington Power Plant (Title V Permit #1501001004)

Dear Mr. Bird:

Huntington Power Plant's Title V Permit Condition II.B.2.g.3 requires the Huntington Plant submit a Notification of Compliance Status according to the requirements of 40 CFR §63.9(h)(2)(ii); and, must contain all the information specified in 40 CFR §63.10030(e)(1) through (8), as applicable. Huntington Unit 2 recently received confirmation of the Low Emitting Electrical Generating Unit (LEE) status for mercury. Therefore, this submittal is intended to update the original notification with this new Mercury LEE information and satisfy this requirement.

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information, or omitting statements and information, including the possibility of fine or imprisonment.

Should you have any questions regarding this information, please contact Richard Neilson, Huntington Power Plant Environmental Engineer at (435) 687-4334 or me at (435) 687-4211.

Sincerely.

Darrell Cunningham

Managing Director Huntington Plant

Responsible Official

Enclosure: Updated Notification of Compliance Status – Unit 2

cc: David Barnhisel, w/enclosure

Steve Jensen, w/enclosure Director, EPA Region VIII

Huntington Unit 2 Mercury and Air Toxics Standard 40 CFR Part 63 Subpart UUUUU Updated Notification of Compliance Status

Description of Affected Source 63.10030(e)(1)

Source Boiler Unit #2	Emission Unit ID				
Electric Utility Steam Generating Unit, bottom tangentially-fired, Babcock & Wilcox	Emission Unit Name (design and manufacturer name)				
Coal-fired unit not low rank virgin coal	Subcategory				
4,960 MMBtu/hr	Size: Rated Heat Input Capacity (mmBtu/hr)				
Pulse Jet Fabric Filter (baghouse) Wet Flue Gas Desulfurization (wet scrubber) LowNOx burner technology, w/ Separated overfire air	Description of add-on controls				
Bituminous Coal, #2 Fuel Oil	Fuels Used				
No	Were the fuel(s) determined by PacifiCorp or EPA through a petition process to be a non-waste under 40 CFR 241.3				
No	Were the fuel(s) were processed from discarded non-hazardous secondary materials within the meaning of 40 CFR 241.3				
Bituminous coal is the primary fuel for the Unit and was burned during the performance tests. #2 Fuel Oil is used for startup fuel, when needed for start-up.	Justification for the selection of fuel(s) burned during performance testing				

Performance Test Summary 63.10030(e)(2)

formance Limit t 1.2 lb/tBtu LEE limit 0.12 lb/tBtu LEE limit 0.12 lb/tBtu UES limit 0.12 lb/tBtu 0.12 lb/tBtu 0.12 lb/tBtu 0.12 lb/tBtu 0.12 lb/mmBtu lbs/year 0r Less than 29 lbs per year 0.030 lb/mmBtu 0.20 lb/mmBtu 0.20 lb/mmBtu			boiler operating days.			and compliance	ndicating conting	ave been conducted i	Quarterly PM tests have been conducted indicating continued compliance to the
Parameter Performance Performance Performance Performance Performance Test Runy (Hg) April 13, 2016 Stack Testing EPA through May 15, Method 30B and ALT-091 each Performance Port Runy (Hg) Performance Performan		= 0.082 lb/mmBtu	Heri is the hourly emissions rate for hour i and n is the number of hourly emissions rate values collected over 30			day rolling average		2013	
Date of retrograme Performance Testing Duration Performance Testing Duration Performance Limit Calculation Performance Limit Calculation Performance Limit Calculation Calculation Performance Limit Calculation Cal	(8	<u>59.365</u> 720	$\frac{=\sum_{i=1}^{n} Heri}{n} \text{ (Eq. 8)}$	0.20 lb/mmBtu	0.082 lb/mmBtu	30 boiler operating	SO ₂ CEMS	through May 15,	(SO ₂)
Date of Testing Performance Method of Testing Performance Testing Testing Test Recommance Performance Emission Lamit Calculation formula April 13, 2016 Stack Testing EPA April 13, 2016 Stack Testing EPA Lamp test runs Method 30B (a) 144 hours 1.2 lb/tBtu LEE limit (Eq.19-s) 1.2 lb/tBtu LEE limit (Eq.19-s) 1.2 lb/tBtu LEE limit (Eq.19-s) E=Average Hg Emission Rane lb/TBu (Eq.19-s) E=Average Hg Emission Rane lb/TBu (Eq.19-s) Cd = Average Hg Emission Rane lb/TBu (Eq.19-s) E=Average Hg Emission Rane lb/TBu (Eq.19-s) Stack Cas Mostume back (as Co2 Concentration (ver volume percent) CO2 Concentration (ver volume percent) E=Average Hg Emission Rane lb/TBu (Eq.19-s) HImax (Eq.19-s) Eyr= E* HImax (Eq.1		= 0.006 lb/mmBtu (Sample Calculation of Run 1)	CUZ%VQ				Methods 1, 2, 3B, 4, 5, 19		Calle Division
ance parte of ameter resting resting rest Runs/ Results of rest Runs/ Reformance resting rest Runs/ April 13, 2016 Stack Testing through May 15, using EPA 2016 Method 30B and ALT-091 each Stack Testing representation formula trap test runs and ALT-091 each Method 30B (@) 144 hours and ALT-091 each Method 30B (@) 149 hours and ALT-091 each Method 30B (@) 149 hours and ALT-091 each Method 30B (@) 149 hours and ALT-091 each Method 30B (@) 140 hours		4.49E-07 x 1800 x100 (12.5)	E lb/mmBtu $= \frac{\text{Cs x Fc x 100}}{\text{Conversion}}$	0.030 lb/mmBtu	0.0070 lb/mmBtu	hours per	using EPA Reference	121ay 12, 2013	Particulate Matter (PM)
Date of Performance Testing Performance Testing Performance Test April 13, 2016 Test April 13, 2016 Method 30B 2016 Method 30B ALT-091 ALT-			lb/yr				3	May 10 2015	Filterable
Date of ter Performance Performance Test Runs/ Performance Test April 13, 2016 Stack Testing 2016 Method 30B Method 30B and ALT-091 each Date of Performance Test April 13, 2016 Stack Testing 2016 Method 30B Method 30B and ALT-091 each Duration Performance Limit 1 LEE limit 1 LEE limit 20.12 lb/tBtu 1 LEE limit 20.12 lb/tBtu 20.12 lb			H _{max} = Maximum Annual Heat Input of the Unit TBtulyr MHI = Maximun Heat Input of the Unit mmBtul⁄mr E _{yr} = Average Hg Emission Rate						
ter Performance Testing Method of Testing Results of Performance Emission Test Calculation formula April 13, 2016 Stack Testing through May 15, 2016 Stack Testing Method 30B Method 30B and ALT-091 ### Items of Test		=0.9 lbs/yr	E=Average Hg Emission Rate						
ter Performance Testing Testing Five dual trap test runs 2016 Results of Testing 2016 Emission Test Limit Equation E = (1.9 b/t) HBtu (Eq.19.9) LEE limit (Eq.19.9) LEE limit (Eq.19.9) E = Average Hg Concentration for mall and ALT-091 2016 and ALT-091 and ALT-091 and ALT-091 and ALT-091 and ALT-091 and ALT-091 E=Average Hg Emission Rate Increase Hg Concentration for form all traps lb/dset for solutions with the form all traps lb/dset for solutions		0:0180 * 50	Eyr= E * Hlmax						
Date of Performance Testing Test Runs/ Performance Test		$\frac{5,733 * 8,760}{1,000,000}$ $= 50.2 \text{ TBtu/yr}$	$= \frac{\text{MHI} * 8,760}{1,000,000 \text{ mm/T}}$	•	0.9 lbs/year				
Date of Performance Testing Duration Performance Limit E = Limit Calculation Limit E = Limit LEE lim			CO2 Concentration (wet volume percent)						3
Date of Performance Performance Testing Duration Performance Test April 13, 2016 Stack Testing EPA through May 15, 2016 and ALT-091 and ALT-091 Performance Emission Test April 13, 2016 Stack Testing EPA trap test runs 2016 and ALT-091 each Emission Each Emission Each Emission Endergord Concentration Formula Emission Calculation Formula Test 1.2 lb/tBtu LEE limit (Eq.19-9) %CO2vw 0.12 lb/tBtu E=Average Hg Emission Rate lb/TBu EAverage Hg Concentration from all traps lb/dscf			Fc =Fuel Factor dscf/mmBtu Bws =Stack Gas Moisture Content (default) %/100 %COOM = Average State Cook						
Date of Performance Performance Testing Duration Performance Test April 13, 2016 through May 15, 2016 Method 30B and ALT-091 each Test Performance Testing Duration Performance Test Test Test Test Test Test Test Tes			E=Average Hg Emission Kate lb/TBtu Cd = Average Hg Concentration from all traps lb/dscf						
Date of Performance Performance Testing Duration Performance Test April 13, 2016 Stack Testing EPA through May 15, 2016 Using EPA Test Test Test Test Test Test Test Test		= 0.02 lb/tBtu	(Eq.19-9)	0.12 lb/tBtu		@ 144 nours each	and ALT-091	2010	8
Date of Performance Testing Duration Performance Test April 13, 2016 Stack Testing Five dual O.02 lb/tBtu 1.2 lb/tBtu Emission Calculation Fest Limit formula		11.2	Cd * Fc * (1 - Bws) * 100 * 10^6 %CO2vw	LEE limit		trap test runs	using EPA	through May 15,	
Date of Performance Testing Duration Test Test Date of Test Runs/ Performance Testing Performance Test		1.3E-12*1800*(1-0.124)*100*10^6	# II	1.2 lb/tRtn	0.02 lb/tBtu	Five dual	Stack Testing	April 13, 2016	Mercury (Hg)
Date of Method of Test Runs/ Results of Emission Calculation	-	Surry Careamation	formula	Limit	Performance Test	Duration	Testing	Performance Test	i est Parameter
		Sample Calculation	Calculation	Emission	Results of	Test Runs/	Method of	Date of	Performance

Quarterly PM tests have been conducted indicating continued compliance to the emission limit. No fuel analyses were required and no operating limits were established.

Identification of Compliance Demonstration 63.10030(e)(3)

Sulfur Dioxide		Mercury	Mountain.	Pollutant		
SO ₂ CEMS	Quarterly Stack Tests using EPA Reference Methods 1, 2, 3B, 4, 5, 19	LEE Annual Method 30B 30 day Test		Method of Demonstration		

Emissions Averaging 63.10030(e)(4)

Emissions averaging will not be used to demonstrate compliance with applicable emission limits

Work Practice Standards 63.10030(e)(5)

Subsequent Tune Up December 18, 2015					Subsequent Time II	(5000ct 20, 201)	October 20 2013	Initial Tune I in	Date Boiler Tune Up was Conducted	
adjustments)	calibration checks and required zero and span	quality control activities including, as applicable,	required monitoring system quality assurance or	monitoring system out-of-control periods, and	associated with monitoring system malfunctions or	monitoring system out-of-control periods, repairs	except during monitoring system malfunctions or	CMS in service during all phases of operation	dusting Gramma acres	CMS in service during starting
							ŀ	#2 Fuel Oil Used for Startup Fuel	Clean Fuel Osed During Startup	Class Evolution in St.

Deviations 63.10030(e)(6)

No deviations occurred from any emission limit or work practice standard.

Additional Information 63.10030(e)(7)

potential of 0.9 lb/yr. Subsequent tests will be performed annually. Initial Hg LEE Method 30B testing occurred from April 13 to May 15, 2016 with a result of 0.02 lb/TBtu average emission rate and a

Identification of Startup Definition 63.10030(e)(8)

The affected source will rely on paragraph (1) for the definition of startup.

Certification Statements 63.10030(e)(5) and 63.10030(e)(7)(ii)

§63.10021(a) to demonstrate continuous compliance. No secondary materials that are solid waste were combusted in any affected I certify that all applicable emissions limits and work practice standards were met. This EGU complies with the requirements in Massed aux

Darrell J. Cunningham

Plant Managing Director and Responsible Official